

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #3

DATED: June 24, 2002

ITEM: AL-VZ 3-1 On Page 2 of Verizon's Panel Surrebuttal Testimony, the witnesses state: "Once access of any sort is given – even authorized access – there is greater "foot traffic" in the central offices which potentially exposes the network infrastructure to a greater degree of risk." Please indicate what other measures, if any, Verizon has taken to reduce or eliminate "foot traffic" in its central offices by vendors, contractors, guests, cleaning crews, etc. Please provide documentation of any such measures.

REPLY: Verizon has always taken steps to reduce "foot traffic" by limiting or restricting who is allowed to access central office(s) and other facilities. Only those individuals that have a legitimate business need are permitted access to the Company's facilities. Verizon employees and contractors themselves are restricted from entry unless they have a Verizon issued identification card. Access cards are not issued until first obtaining a Verizon ID card. The access card request (and Contractor ID) requires supervisory approval. In the limited instances where a visitor(s) is permitted entry, the visitor(s) is to be escorted.

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Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #3

DATED: June 24, 2002

ITEM: AL-VZ 3-2 Referring to Page 10 of Verizon's Panel Surrebuttal Testimony, with respect to Verizon's proposal to convert one in-service arrangement at its Hopkinton central office to a virtual collocation arrangement, please indicate if there have been any security-related incidents or breaches at this particular central office. If so, please provide details of such incidents or breaches. In addition, other than Verizon's stated reason for converting this one in-service arrangement in Hopkinton, *i.e.*, the lack of separate space at this central office is inconsistent with Verizon's proposal to restrict all collocated equipment to separate space, is there anything specific about the layout and configuration of the Hopkinton central office which renders the Hopkinton central office unsuitable for continued use of shared space? If so, please explain.

REPLY: There have been no verified security related incidences or breaches at this central office. The basis for converting this cageless arrangement to virtual collocation would be to meet the requirement for separate and secured space for security reasons.

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Respondent: Peter Shepherd
Title: Director

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #3

DATED: June 24, 2002

ITEM: AL-VZ 3-3 On Page 11 of Verizon's Panel Surrebuttal Testimony, with respect to the FCC's requirement that states allow cageless collocation, the witnesses state that "the FCC's requirements predated the events of September 11th. The Department is legitimately examining the risks associated with those requirements post-September 11." Is it Verizon's position that the events of September 11 relieved either Verizon or the Department of its obligation to conform to FCC regulations with respect to collocation?

REPLY: It is within the Department's scope of authority to determine whether physical collocation (including cageless collocation) is practical in a given location. *See e.g.*, Verizon MA's Replies to Sprint-VZ 2-16, 2-18, and 2-19.

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Respondent: Peter Shepherd

Title: Director

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #3

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ITEM: AL-VZ 3-4 On Page 15 of Verizon's Panel Surrebuttal Testimony, with respect to the factors proposed by Verizon for determining which central offices should be deemed "critical" central offices, the witnesses state: "...these factors include whether accidental or intentional damage to the network resulting in disruption of existing service in particular central offices could pose national security risks, endanger the health, safety and welfare of many more lives, and jeopardize the operations of major businesses, public safety, and government agencies, as well as advanced technology companies and other institutions that are involved in national security matters."

With respect to the references to "operations of major businesses" and "advanced technology companies", please clarify if the factors presented by the witnesses are limited to businesses and companies "involved in national security matters." Specifically, based on the factors set out above, if a major business *not involved in security matters* is served by a central office, would the presence of that business be a contributing and/or determining factor in deciding whether that central office is "critical" under Verizon's proposal?

REPLY: The factors in determining a "critical" central office ("CO") may include, but are not limited to, whether the CO serves businesses involved with national security matters. As Verizon MA suggests, other factors may be considered, such as whether disruption of telecommunication in a particular CO could have a significant, detrimental impact on the public's health, safety, welfare and national security interests.

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D.T.E. 02-8

Respondent: Francesco S. Mattera
Title: Director

REQUEST: Allegiance Telecom of Massachusetts, Inc., Set #3

DATED: June 24, 2002

ITEM: AL-VZ 3-5 Referring to Page 16 of Verizon's Panel Surrebuttal Testimony, with respect to the four E911 control tandems in Massachusetts central offices, (a) please identify the location of the four central offices in which the E911 control tandems are located; and (b) notwithstanding your response to (a), please describe where these E911 control tandems are located relative to CLEC equipment, *i.e.*, are they located in secure separate space, would CLEC personnel need key or card access in order to come in contact with these tandems?

REPLY:

- a) E-911 control tandems are located at the Medfield, Northampton, Wakefield, and Westborough central offices.
- b) They are located in secure space separate from CLEC collocation areas. CLEC personnel would need key or card access to come in contact with these tandems.

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Respondent: Peter Shepherd
Title: Director

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DATED: June 24, 2002

ITEM: AL-VZ 3-6 Referring to Page 17 of Verizon's Panel Surrebuttal Testimony, please explain what Verizon means by "economic interest of the general public" and how that factor would be applied and considered for purposes of determining which central offices qualify as "critical" under Verizon's proposal in this docket?

REPLY: See Verizon MA's Reply to AL-VZ 3-4.

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ITEM: AL-VZ 3-7 Referring to Pages 26-28 of Verizon's Panel Surrebuttal Testimony, and specifically to Verizon's witnesses' response to AT&T's contention that Verizon's proposals in this investigation are unlawful, does the June 18, 2002 decision of the United States Circuit Court of Appeals for the District of Columbia Circuit in Verizon et al. v. FCC, in which the court dismissed Verizon's appeal of the FCC's colocation ("sic") rules, have any impact on the witnesses' opinion? If so, what is that impact? If not, why not?

REPLY: No. See Verizon MA's Reply to AL-VZ 3-3.

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Respondent: Peter Shepherd
Title: Director

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ITEM: AL-VZ 3-8 Referring to page 27 of Verizon's Panel Surrebuttal Testimony, the Verizon witnesses state "Given that the Department has already ruled that physical collocation arrangements generally should be in separated, secured space, Verizon MA's proposals are appropriate." In making that statement, is the panel referring to any Department ruling other than the Department's 1998 order in D.T.E. 98-21?

REPLY: No.